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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

10 LARRY BOWOTO, et. al.

Case No. C-99-2506-SI

11 Plaintiffs,

12 v.
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PARTIES' STIPULATION REGARDING THE
USE OF STATE COURT DISCOVERY IN THE
FEDERAL COURT ACTION

CHEVRONTEXACO CORPORATION, et

al.,

Defendants.

1 THE PARTIES STIPULATE AS FOLLOWS:

2 All responses to interrogatories and requests for admission made, all documents produced
 3 and all depositions taken in the state court action, *Larry Bowoto, et al., v. ChevronTexaco*
 4 *Corporation, et al.*, CGC-03-417580 (County of San Francisco), by the parties to the federal court
 5 action, *Larry Bowoto, et al., v. ChevronTexaco Corporation, et al.*, C-99-2506-SI (N.D. Cal.),
 6 may be used in the federal court action to the same extent as if the state discovery had been
 7 propounded and responded to in the federal court action; EXCEPT THAT defendants reserve the
 8 right to object to the use in the federal court action of any discovery obtained in the state court
 9 action after the discovery cut-off date in the federal court action.

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11 DATED: November 9, 2005

JONES DAY

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By: s/Caroline N. Mitchell
 13 Caroline N. Mitchell

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Attorneys for Defendants

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17 DATED: November __, 2005

EARTHRIGHTS INTERNATIONAL

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By: _____
 19 Marco Simons

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Attorneys for Plaintiffs

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IT IS SO ORDERED.

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DATED: November __, 2005

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By: _____

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The Hon. S.
 25 United

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SFI-531547v1

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